



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA '07 MJ 8986

UNITED STATES OF AMERICA) Magistrate Case No.:
Plaintiff,) COMPLAINT FOR VIOLATION OF
v.) 21 U.S.C. § 952 and 960
Lakisha KINLAW-Capri,) Importation of a Controlled
Defendant.) Substance (Felony)

The undersigned complainant being duly sworn states:

That on or about December 15, 2007 within the Southern District of California, defendant Lakisha KINLAW-Capri, did knowingly and intentionally import approximately 36.34 kilograms (79.94 pounds) of marijuana, a Schedule I Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Section 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

[Signature]
Enrique Porregrosa Special Agent
U. S. Immigration & Customs
Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 17th DAY OF DECEMBER 2007.

[Signature]
PETER C. LEWIS
UNITED STATES MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA

v.

2 Lakisha KINLAW-Capri

3 STATEMENT OF FACTS

4 This complaint is based on the reports, documents, and notes
5 furnished to U.S. Immigration and Customs Enforcement Special Agent
6 Enrique Torregrosa.

7 On December 15, 2007, at approximately 1521 hours, Lakisha
8 KINLAW-Capri entered the United States from the Republic of Mexico
9 via the Calexico, California East Port of Entry. KINLAW made entry
10 into the United States driving a 1987 Honda Accord bearing
11 California U.S. plate number 2DLT669. KINLAW was the driver and
12 sole occupant of the vehicle.

13 At primary inspection, KINLAW gave an oral negative Customs
14 declaration to Customs and Border Protection Officer (CBPO) A.
15 Lopez. KINLAW stated that she was coming from eating Chinese food
16 in Mexicali, Mexico. KINLAW also stated that she owned the vehicle
17 for about four months and that she was going back home to El
18 Centro, California. CBPO Lopez asked KINLAW, how long did she stay
19 in Mexico, and KINLAW stated that she was there for two days
20 picking up her vehicle. CBPO Lopez asked KINLAW to open the trunk
21 of the vehicle and when she did, CBPO Lopez noticed several
22 packages wrapped with clear plastic hidden within the trunk of the
23 vehicle. CBPO Lopez hand-cuffed KINLAW and escorted her to the
24 vehicle secondary office for a pat-down.

25 Upon arrival to the vehicle secondary office, CBPO Lopez
26 conducted a pat-down on KINLAW with negative results. CBPO Lopez
27 turned the inspection to CBPO Ramos. CBPO Ramos also obtained a
28 negative Customs declaration from KINLAW and asked her about her

1 trip to Mexico and where she was going. KINLAW stated that she was
2 going back home to El Centro, California and that she went to visit
3 her boyfriend in Mexicali. CBP canine Officer McGee screened the
4 vehicle utilizing his assigned Human/Narcotic Detector Dog (HNDD).
5 HNDD alerted to the trunk area of the vehicle.

6 A subsequent search of the trunk area of the vehicle by CBPO
7 Ramos revealed eight packages concealed within a specially built
8 compartment located under the rear seat and trunk area of the
9 vehicle. The approximate weight of the packages was 36.34
10 kilograms (79.94 pounds). CBPO Ramos probed one package, which
11 produced a green leafy substance, which field-tested positive for
12 marijuana.

13 Upon arrival to the Imperial County Jail, Imperial County
14 Correctional Officer Jimenez knew KINLAW and asked her what are you
15 doing here? You just left. KINLAW made a spontaneous respond, "I
16 was bringing weed across the border, about 36.5 pounds".
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